

142
MIKE HAYDEN

Governor

~~XXXXXX~~

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Stanley C. Grant, Ph.D.

Secretary

STATE OF KANSAS



Forbes Field
Topeka, KS 66620-0001
(913) 862-9360

DEPARTMENT OF HEALTH AND ENVIRONMENT

August 4, 1987

Mr. David Trombold
Hazardous Waste Coordinator
Conservation Services, Inc.
2525 North New York
Wichita, KS 67219

RECEIVED
AUG 12 1987
RCOM SECTION

Re: Hazardous Waste Compliance Inspection
EPA ID number KSD007246846

Mr. Trombold:

On July 2, 1987 an inspection of your TSD facility was conducted by this department to determine compliance with state and federal regulations concerning hazardous waste.

The inspection revealed that your facility generates the following hazardous waste as defined by 40 CFR 261:

	Wastes Generated	Waste Codes
1.	chlorinated solvents	F001, F002
2.	ignitable solvents and solvent-paint mixtures	D001
3.	listed solvents and solvent-paint mixtures	F003, F005
4.	paint solids	D005, D006, D007, D008
5.	sparged carbon and condensate from sparging unit	F001

The quantity of hazardous waste generated is more than 1000 kilograms (approximately 2200 pounds) per month. Your facility is, therefore, regulated under 40 CFR, Part 262 as adopted by K.A.R. 28-31-4. In addition to being an EPA generator, your facility is regulated as a TSD under interim status.

The inspection identified the following items not in compliance with regulations concerning generators of hazardous waste and hazardous waste treatment, storage, and disposal (TSD) facilities:

- 1) 40 CFR 265.13 (a) (1) states "before an owner or operator treats, stores, or disposes of any hazardous waste, he must obtain a detailed chemical and physical analysis of a representative sample of the waste". You are not currently fulfilling this requirement with respect to perchloroethylene sludge customers.



R00001600
RCRA Records Center

2) You had several (10 - 20) excessively rusted and dented drums of hazardous waste in storage at the staging area and in warehouse C. 40 CFR 265 Subpart I requires that containers of hazardous waste be in good condition.

3) Lack of hazardous waste determination. A person who generates a solid waste, as defined in 40 CFR 261.2, must determine if that waste is a hazardous waste using the methods described in 40 CFR 262.11 (a) through (c). There were approximately 20 drums of unknown contents stored north of the Service Chemical warehouse. I understand these were generated from Service Chemical activities. Some of these drums were severely rusted and deteriorated. Also, incompatible storage appeared possible, since drums marked "caustic soda" were stored in close proximity to drums you indicated may contain "chlorinated solvent".

4) Ten drums of hazardous waste from Electro-Mech did not exhibit start dates as required under K.A.R. 28-31-8.

5) Your closure cost estimate did not take into account the possibility of having to incinerate at least some of the drums. Yet, some of your hazardous solids wastestreams are currently sent off-site for incineration (being the only viable disposal alternative). According to 40 CFR 265.142, closure cost estimates should be based on a "worst case" situation.

By September 22, 1987 please send me written documentation outlining the steps you have take to correct the above items. This should include:

- (a) the identity of the drums stored in the Service Chemical area, and how they will be handled;
- (b) excerpt from your waste analysis plan showing analysis will be required of perc sludge customers before pickup is made; and
- (c) revised closure cost estimates.

Also, you should be aware that, under Federal law (40 CFR 268.7), all your shipments of "F" listed solvent waste off-site must be accompanied by a notification providing the following information:

- a. EPA waste number
- b. Applicable treatment standard (a list of treatment standards for spent solvents is enclosed with this letter)
- c. Manifest number
- d. Waste analysis data, if available

This rule will be adopted by the State of Kansas by May 1988. In the interim, it is enforceable only under Federal Law. In your particular case, it is applicable at a minimum to your shipments of waste solvent blends and condensate from the sparging unit to Systech. These blends are considered "F" listed solvents under the mixture rule.

Mr. David Trombold
8/3/87

3

Enclosed, is the list of "California Wastes" you requested.

Your cooperation with the Hazardous Waste Management Program is appreciated. If you have questions concerning the inspection, please call me at (316) 651-5529.

Sincerely,

Dale T. Stuckey

Dale T. Stuckey
Inspections and Enforcement Section
Bureau of Waste Management

cc: Tom Gross
J.P. Goetz

enclosures

MIKE HAYDEN
Governor
~~XXXXXXXXXXXX~~

~~SECRET~~

Stanley C. Grant, Ph.D.
Secretary

STATE OF KANSAS



Forbes Field
Topeka, KS 66620-0001
(913) 862-9360

DEPARTMENT OF HEALTH AND ENVIRONMENT

RCRA COMPLIANCE INSPECTION REPORT GENERATORS AND TRANSPORTERS CHECKLIST

A. General

Date 7/2/87 Time 0930 EPA ID No. KSD007246846
Facility Name Conservation Services, Inc.
Street 2525 New York
City Wichita, Kansas Zip 67219
County Sedgwick Phone (316) 267-5742
Contacts David Trombold--Hazardous Waste Coordinator
Inspector Dale T. Stuckey
Other 6 employees

B. Hazardous Waste Determination

1. Does generator generate waste(s) listed in 261.31. 261.32 or 261.33? YES NO

EPA Hazardous Waste No.	Describe Waste Material	Quantity/Month	Method of Disposal
F001	chlorinated solvent	37,000 lbs/6 mths	H.R.I. (Hydrocarbon Recyclers)
F001	perchloroethylene-contaminated dry cleaning cartridges	16,000 lbs since Oct. 86	sparged on-site (recycled perc is sold)
F001	chlorinated solvent includ. perc sludge	31,000 lbs since Sep. 86	blended for fuel, sent to Systech
F003	paint and fiber-glass solvent	5,600 lbs since Jan 87	" "
F005	paint solvents	19,600 lbs since Jan 87	" "
F005	MEK solvent from one customer	31,000 lbs since Jan 87	H.R.I.
F001	water-based wastes (neutralized corrosives, condensate from sparging unit, contaminated stormwater from diked areas, water soluble oil)	20,000 lbs since Jan 87	H.R.I.
F001	sparged carbon	?	stored for bulk shipment to Systech

2. Do generator generate waste(s), not listed, that exhibit hazardous characteristics (corrosivity, ignitability, reactivity, EP toxicity)? YES NO

a. If yes, list waste(s), EPA Hazardous Waste No. according to 40 CFR, Subpart C, and quantity.

EPA Hazardous Waste No.	Waste Material	Quantity/Month	Method of Disposal
D001	ignitable paint solvents (alcohols glycol ethers, aliphatics, mineral spirits, etc.)	304,000 lbs/6 mths	blended for fuel, sent to Systech
D005, D006, D007, D008	paint solids for incineration	40,000 lbs since Jan 87	Rollins Environmental
D00?, D006, D007, D008	paint solids for landfilling (almost all chrome solids)	29,000 lbs since Jan 87	USPCI

b. Does generator determine characteristics by testing or by applying knowledge of processes? Explain below:

1. If determined by testing, did generator use test method 261.21, 261.22, 261.23, 261.24 or was equivalent test method used? YES NO

a. If equivalent method used, obtain copy of test method.

3. Are there any other wastes generated by generator? YES NO

a. If yes, list below:

Waste Description	Disposal Method
sparged dry cleaning cartridges	Brooks landfill

b. Did the generator test these wastes to determine if hazardous?

Explain if necessary: YES NO

4. Generator size classification:

SQ (<25 kg/month)

EPA SQ (100 - 1000 kg/month)

KG (25 - 100 kg/month)

EPA (>1000 kg/month)

General information

--They still have approx. 160 waste customers. There are only two out-of-state accounts, in Missouri and Texas.

--Thirteen of their customers are body shops. That probably means there are a lot of shops in Wichita that are not being serviced by anyone.

--They recently bought a "Gorator" dispersant/mixer to help chop and blend solids and solvent together for Systech fuel. They are also still using the original dispersing unit. The "Gorator" is actually attached to the side of one of the vertical waste storage tanks and can be used to pump the contents of one tank to the other as well as blend up solvents/solids into the tanks.

--For economic reasons, no on-site distillation now takes place.

--They are increasing the volume of water-based wastestreams handled (e.g. water soluble oil); and are also now taking such wastes as neutralized (some containing chrome) acid. They do not take any waste unless it is neutralized.

--The chlorinated solvents which are blended into Systech fuel, contain 10-60 % chlorine. No wastestream with over 60% chlorine is used for fuel. I did see, however, that one waste shipment containing 89% chlorinated was sent to Systech last year. I was told this waste was blended to a chlorine content of about 30% before being shipped.

--Most of the paint solvent taken in is either lacquer or enamel thinner. A lot of the enamel thinner comes from paint companies, such as Kansas Paint and Color. Most of the lacquer thinner comes from Beechcraft.

--None of the listed paint solvent wastestreams are now being sent for recycling (except for one MEK wastestream being shipped to HRI).

--Solvent-contaminated fly ash is no longer being sent over from Systech. David feels they probably just incorporate this waste into their cement now. The last shipment of fly ash received from Systech by Reid was 6/12/86.

--The established waste outlets for CSI include: USPCI, HRI, Rollins (for incineration), and Systech.

--The water-based wastestream being shipped to HRI includes: water soluble machining oil, neutralized corrosives from metal finishing processes, condensate from the sparging unit, and contaminated stormwater from the diked areas in CSI's staging area, and outside warehouse C. HRI evaporates and treats water and discharges down the sewer, and sends solids either to a landfill or to Systech. Some neutralized corrosives (solutions which cannot be put down drain, such as copper contaminated solution from wire-drawing operations), however, are shipped direct from the customer to Systech.

--No land disposal ban notification accompanies any of the shipments of F listed waste from CSI to the off-site TSD.

--One tanker per week of waste fuel is shipped to Systech.

--CSI workers do a compatibility and pH check on all incoming wastes. But they do no visual check.

--Most of the confirmation analyses are done at Heuristech Lab. and channeled from there to other labs as needed. Waste with a high halogen content are analyzed at Systech. Systech also performs detailed analysis on all waste fuel shipments. Bill Groutas, a professor at WSU, does confirmation analysis for all wastestreams destined for distillation. Systech does detailed analysis on distillation wastestreams. Attached is a copy of the Waste Profile Sheet which is filled out for new customers, and a copy of the waste sample sheet for detailed analysis.

--CSI does not require a detailed analysis (either original or annual review) on wastes from dry cleaners (perc still bottoms and cartridges). However, when CSI accumulates up to 20 drums of perc still bottom waste on site, they take a composite sample of the drums for analysis.

--Perc reclaimed during sparging is sent to Service Chemical (a sister company of CSI) who in turn sells it to Apparelmasters, a Wichita dry cleaning firm.

--Total purgeable organic carbon is the parameter used in verification analysis for those wastestreams destined for landfilling or incineration. This is to ensure that those wastes which should be incinerated do not end up landfilled. TOC is also used in the original detailed analysis of new wastestreams.

--I got two soil samples (at J. Ramsey's request) for both Ep toxicity and VOC analysis outside warehouse (reference attached sketch). Analysis (also attached) indicated the samples were non-hazardous.

Field observations

Distillation and sparging area

Indoor

-One drum of sparged carbon accumulated near sparging unit. Labeled and dated.

Outside

-Two drums of dry cleaning cartridges from Cowboy Cleaners. Dated and labeled.

-Three other drums of cartridges. Labeled and dated.

-Twenty rusted drums in storage outside northeast corner of main plant. David wasn't sure what these drums contained. He did say they were from Service Chemical. Some of them were labeled "Caustic Soda". One other was labeled "recycled lacquer thinner". Another was a rusted lined drum, 1/4 full labeled "hydrofluoric acid". The labels on the rest were too badly faded to read. David said he thought some of these may contain chlorinated solvents.

Staging area

They no longer have a USPCI gondola in this area.

Inventory:

-6 drums containing miscellaneous trash (used pump diaphragms, sample bottles, etc.). These will be handled as hazardous waste and shipped to USPCI. They were labeled and dated.

-18 drums of assorted paint solids that could not be ground up enough to pump into the vertical tanks. Labeled and dated. At least two of these were rusted and dented.

-10 drums of paint stripper from Electro-Mech did not display start dates.

-4 drums of paint solvent from Kansas Paint and Color, Wichita.

-8 other drums of solvent awaiting processing.

Warehouse C

All drums were on pallets.

Inside inventory:

- Approx. 48 drums from Kansas Paint and Color. Marked with the shipping name "Waste Solvent, n.o.s." (improper).
- Approx. 28 drums from Mid Continent Cabinetry in Newton. Two of these were excessively rusted.
- 3 drums of waste tric from Smith and Smith Aircraft.
- 8 drums from Coleman North in Wichita.
- 41 other assorted drums.
- 3 drums from Copeland Corporation, Wichita. Labeled with "Flammable Liquid" label, but marked with shipping name "Waste 1,1,1 tric".
- Approx. 312 other drums from various customers--chlorinated and non-chlorinated solvent. Included with this number was 18 drums of recycled perc to be sold to Appararelmasters.

Outside inventory (on loading ramp):

- 24 drums of 1,1,1 tric from Red-T-Coil in Nagadoches, Texas.

Findings

- No land ban notification is accompanying shipments of F Listed solvent blends to Systech.
- No analysis is required of waste perc customers before shipment.
- 20 drums of unknown contents stored outside northeast of main warehouse. Some of the drums are rusted. Also, may be possible incompatible storage (caustic soda and chlorinated solvent in close proximity).
- Two rusted and dented drums in the staging area.
- Ten drums from Electro-Mech in the staging area. Not dated.
- At least 5 excessively rusted drums in Warehouse C.
- At least 4 excessively dented drums in Warehouse C.
- Closure cost estimates doesn't take into account drums needing to be incinerated, yet, incineration is one of the off-site disposal methods now used for certain drums.

ADDENDUM TO
GENERATOR CHECKLIST
LAND BAN F-SOLVENTS

A. F-Solvent Identification

1. Does the handler generate the following wastes?

a. F001

☒ Yes ☐ No

b. F002

☒ Yes ☐ No

c. F003

☒ Yes ☐ No

If an F003 wastestream listed solely for for ignitability was mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic?

Yes No NA

d. F004

Yes ☒ No

e. F005

☒ Yes ☐ No

B. National Variances and Extensions/Petitions

1. Is the waste generated by a Small Quantity Generator? [268.30(a)(1)]

Yes ☒ No

2. Is the waste generated from a RCRA corrective action? [268.30(a)(2)]

Yes ☒ No

3. Is the waste generated from a CERCLA response action? [268.30(a)(2)]

Yes ☒ No

4. Is the solvent waste a solvent-water mixture, solvent-containing sludge, or solvent-contaminated soil containing less than one percent total F001-F005 constituents by weight? [268.30(a)(3)]

Yes ☒ No

5. Any extensions/petitions approved?

Yes ☒ No

C. BDAT Treatability Group - Treatment Standards Identification

1. Did the generator correctly determine the appropriate treatability group and treatment standards of the waste [268.41]. Wastewaters containing solvents; spent methylene chloride



HAZARDOUS WASTE PROFILE SHEET

CONSERVATION SERVICES, INC.
2525 N. NEW YORK
WICHITA, KANSAS 67219
(316) 267-5742

GENERATOR _____ EPA ID # _____
ADDRESS _____ P.O. BOX _____ PHONE # _____
CITY/STATE _____ ZIP CODE _____ CONTACT _____
US DOT SHIPPING NAME _____ HAZARD CLASS _____
UN OR NA # _____ EPA WASTE NUMBER(S) _____

SPECIFIC WASTESTREAM INFORMATION

Known components are _____
Describe routine variations (if any) in wastestream _____
Waste is typically _____ % LIQUID _____ % SLURRY _____ % SLUDGE _____ % SOLID
Average number of inches of settled solids _____ INCHES PER _____ GALLON DRUM (container size).
Time of storage on site before shipment _____
Is this waste stored in a segregated area? _____ YES _____ NO. If not, please describe other materials stored nearby _____

GENERAL WASTESTREAM INFORMATION

List other sources of WASTE which could accidentally be mixed with this wastestream _____
List any materials used on site which could be incompatible with this wastestream (ie. acids, caustics....other). _____
Describe procedure for managing WASTES on site to prevent cross-contamination _____

ADDITIONAL INFORMATION

In storage, drum bungs must be kept in place to prevent evaporation and/or water contamination.
Generator must be willing to notify CSI of any significant variations in this wastestream.
Wastes sent to CSI must not contain PCB's or Radioactivity.

ANALYSIS/VERIFICATION

Does generator have current analysis data? _____ YES _____ NO. Does generator have current Material Safety Data Sheet(s) of component(s)? _____ YES _____ NO. Please attach copies of analysis and/or MSDS's.
Waste sampled by _____ GENERATOR _____ CSI REPRESENTATIVE _____ OTHER. Date sampled _____
CSI Representative collecting information _____ Date _____

CERTIFICATION STATEMENT: I certify to the best of my knowledge and ability that the information is accurate, complete, and true. I realize there may be additional costs toward final disposal of this waste if there is SIGNIFICANT variation between the information and the actual waste received by CSI.

COMPANY REPRESENTATIVE(signature) _____ Date _____

COMMENTS _____

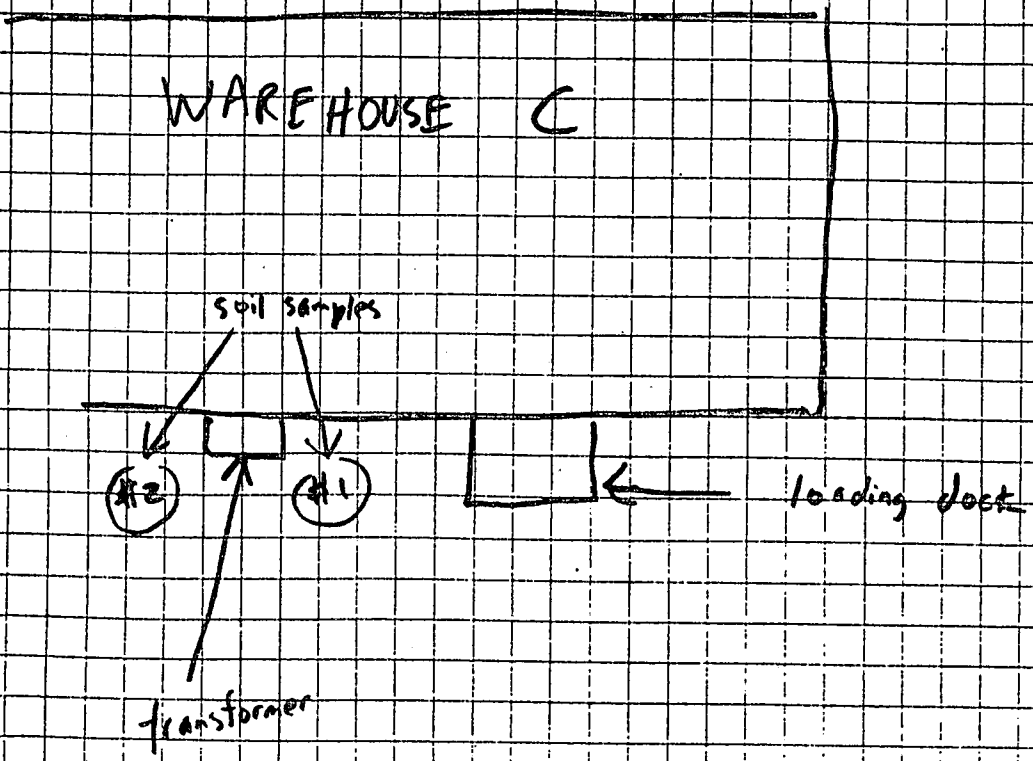
Copies: Process Engineer, Generator, CSI Representative, File

Date 7/2/87

Project RCRA inspection

by Dale T. Stuckey

Subject Conservation Services, Wichita



KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
LABORATORY SERVICES AND RESEARCH
ENVIRONMENTAL ORGANIC LABORATORY
TOPEKA, KANSAS 66620



GC/MS ANALYSIS REPORT

REPORT TO: DALE T. STUCKEY
ADDRESS: SCD-OFFICE, WICHITA, KS.

LAB NUMBER: 8000310C
REPORT DATE: 7-21-87

SAMPLE COLLECTION INFORMATION

SAMPLE IDENTIFICATION NUMBER: 7/2/87-CSI #1 SAMPLE TYPE: SOIL
COLLECTION SITE: CONSERVATION SERVICES, 2525 NEW YORK, WICHITA (SG CO.)
COLLECTED BY: DALE T. STUCKEY DATE: 7- 2-87 TIME: 1600

HT

RESULTS OF ANALYSIS

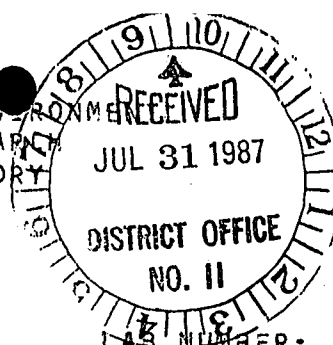
PURGEABLE ORGANICS

	CONCENTRATION (MG/KG)	DETECTION LIMIT (MG/KG)
CHLOROMETHANE	NOT DETECTED	12.5
BROMOMETHANE	NOT DETECTED	3.0
VINYL CHLORIDE	NOT DETECTED	2.0
CHLOROETHANE	NOT DETECTED	9.3
DICHLOROMETHANE	NOT DETECTED	2.3
1,1-DICHLOROETHYLENE	NOT DETECTED	1.5
1,1-DICHLOROETHANE	NOT DETECTED	1.3
TRANS &/OR CIS 1,2-DICHLOROETHYLENE	NOT DETECTED	1.3
TRICHLOROMETHANE (THM)	NOT DETECTED	1.3
1,2-DICHLOROETHANE	NOT DETECTED	1.5
1,1,1-TRICHLOROETHANE	NOT DETECTED	1.8
TETRACHLOROMETHANE	NOT DETECTED	1.8
BROMODICHLOROMETHANE (THM)	NOT DETECTED	1.3
1,2-DICHLOROPROPANE	NOT DETECTED	1.0
TRANS 1,3-DICHLOROPROPENE	NOT DETECTED	2.0
TRICHLOROETHYLENE	NOT DETECTED	1.5
BENZENE	NOT DETECTED	1.0
DIBROMOCHLOROMETHANE (THM)	NOT DETECTED	1.8
CIS 1,3-DICHLOROPROPENE	NOT DETECTED	2.3
1,1,2-TRICHLOROETHANE	NOT DETECTED	1.5
BROMOFORM (THM)	NOT DETECTED	3.8
1,1,2,2-TETRACHLOROETHANE	NOT DETECTED	1.5
TETRACHLOROETHYLENE	NOT DETECTED	2.8
TOLUENE	NOT DETECTED	1.0
CHLOROBENZENE	NOT DETECTED	1.0
ETHYLBENZENE	NOT DETECTED	1.8
META-XYLENE	NOT DETECTED	1.5
ORTHO &/OR PARA-XYLENE	NOT DETECTED	1.5
1,3-DICHLOROBENZENE	NOT DETECTED	2.5
1,2 &/OR 1,4-DICHLOROBENZENE	NOT DETECTED	2.5

ANALYST: RICHARD L. PIERCE
COPY TO: J. RAMSEY, FORBES BLDG 321

ROGER H. CARLSON, PH.D., DIRECTOR

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
LABORATORY SERVICES AND RESEARCH
ENVIRONMENTAL ORGANIC LABORATORY
TOPEKA, KANSAS 66620



GC/MS ANALYSIS REPORT

REPORT TO: DALE T. STUCKEY
ADDRESS: SCD-OFFICE, WICHITA, KS.

LAB NUMBER: 8000300C
REPORT DATE: 7-21-87

SAMPLE COLLECTION INFORMATION

SAMPLE IDENTIFICATION NUMBER: 7/2/87-CSI #2
COLLECTION SITE: CONSERVATION SERVICES, 2525 NEW YORK, WICHITA (SG CO.)
COLLECTED BY: DALE T. STUCKEY
DATE: 7-2-87
TIME: 1600

RESULTS OF ANALYSIS

HT

PURGABLE ORGANICS

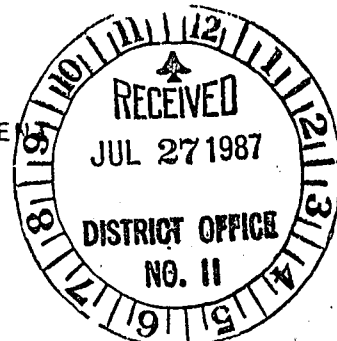
	CONCENTRATION (MG/KG)	DETECTION LIMIT (MG/KG)
CHLOROMETHANE	NOT DETECTED	12.5
BROMOMETHANE	NOT DETECTED	3.0
VINYL CHLORIDE	NOT DETECTED	2.0
CHLOROETHANE	NOT DETECTED	9.3
DICHLOROMETHANE	NOT DETECTED	2.3
1,1-DICHLOROETHYLENE	NOT DETECTED	1.5
1,1-DICHLOROETHANE	NOT DETECTED	1.3
TRANS &/OR CIS 1,2-DICHLOROETHYLENE	NOT DETECTED	1.3
TRICHLOROMETHANE (THM)	NOT DETECTED	1.3
1,2-DICHLOROETHANE	NOT DETECTED	1.5
1,1,1-TRICHLOROETHANE	NOT DETECTED	1.8
TETRACHLOROMETHANE	NOT DETECTED	1.8
BROMODICHLOROMETHANE (THM)	NOT DETECTED	1.3
1,2-DICHLOROPROPANE	NOT DETECTED	1.0
TRANS 1,3-DICHLOROPROPENE	NOT DETECTED	2.0
TRICHLOROETHYLENE	NOT DETECTED	1.5
BENZENE	NOT DETECTED	1.0
DIBROMOCHLOROMETHANE (THM)	NOT DETECTED	1.8
CIS 1,3-DICHLOROPROPENE	NOT DETECTED	2.3
1,1,2-TRICHLOROETHANE	NOT DETECTED	1.5
BROMOFORM (THM)	NOT DETECTED	3.8
1,1,2,2-TETRACHLOROETHANE	NOT DETECTED	1.5
TETRACHLOROETHYLENE	NOT DETECTED	2.8
CHLORUENE	NOT DETECTED	1.0
CHLOROBENZENE	NOT DETECTED	1.0
ETHYLBENZENE	NOT DETECTED	1.8
META-XYLENE	NOT DETECTED	1.5
ORTHO &/OR PARA-XYLENE	NOT DETECTED	1.5
1,3-DICHLOROBENZENE	NOT DETECTED	2.5
1,2 &/OR 1,4-DICHLOROBENZENE	NOT DETECTED	2.5

ANALYST: RICHARD L. PIERCE *RLP*

ROGER H. CARLSON, PH.D., DIRECTOR

COPY TO: J. RAMSEY, FORBES BLDG 321

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
LABORATORY SERVICES AND RESEARCH
INORGANIC CHEMISTRY LABORATORY
TOPEKA, KANSAS 66620-8420



RESULTS OF LABORATORY ANALYSIS

REPORT TO: DALE STUCKEY---WICHITA
ADDRESS:

LAB NUMBER: 800031PT
ACCOUNT CODE: WM.
MATRIX: SOIL

LOCALITY: CONSERVATION SERVICES 2525 NEW YORK TIME COLLECTED: 1600
COLLECTED BY: DALE STUCKEY DATE COLLECTED: 7- 2-87
SAMPLE ID: DATE-RECEIVED: 7- 8-87
COMMENTS: DATE REPORTED: 7-22-87
ACID LEACH; EP TOXICITY PENDING

* * * * *

RESULTS EXPRESSED IN MILLIGRAMS/KILOGRAM

TOTAL HARD.	NA	PH	NA	IRON	NA
(CACO3)		TURBIDITY	NA	MANGANESE	NA
CALCIUM	NA	SPECIFIC COND.	NA	ARSENIC	0.040
MAGNESIUM	NA	T. DISSOLVED SOLIDS	NA	BARIUM	213.04
SODIUM	NA	TOTAL PHOSPHORUS (P)	NA	CADMIUM	6.180
POTASSIUM	NA	SILICA (SIC2)	NA	CHROMIUM	56.90
		BORON	NA	COPPER	32.00
TOTAL ALK.	NA	DISSOLVED OXYGEN	NA	LEAD	250.060
(CACO3)		BOC	NA	MERCURY	0.0600
CHLORIDE	NA	COD	NA	SELENIUM	ND
SULFATE	NA	AMMONIA (N)	NA	SILVER	1.498
NITRATE (N)	NA	T. SUS. SOLIDS	NA	ZINC	976.00
FLUORIDE	NA			ALUMINUM	NA
				BERYLLIUM	NA
CYANIDES	NA	CARBONATE HARDNESS	NA	NICKEL	NA
OIL/GREASE	NA	NON-CARBONATE HARD.	NA	ANTIMONY	NA
PHENOLS	NA	NAHCO3 ALKALINITY	NA	THALLIUM	NA
TDP	NA	MSAS	NA		
SULFIDE /	NA	FLASH POINT	NA		

CHEMIST: FD NA - NOT ANALYZED ND - NOT DETECTED

* * * * *

COPY TO: FILE
J. RAMSEY---3WM, KDHE-TOPEKA, KS.

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
LABORATORY SERVICES AND RESEARCH
INORGANIC CHEMISTRY LABORATORY
TOPEKA, KANSAS 66620-8420



RESULTS OF LABORATORY ANALYSIS

REPORT TO: DALE STUCKEY---KDHE WICHITA
ADDRESS:

LAB NUMBER: 800030PT
ACCOUNT CODE: WM
MATRIX: SOIL

LOCALITY: CONSERVATION SERVICES 2525 NEW YORK TIME COLLECTED: 1600

COLLECTED BY: DALE STUCKEY DATE COLLECTED: 7- 2-87

SAMPLE ID: DATE-RECEIVED: 7- 8-87

COMMENTS: DATE REPORTED: 7-22-87

ACID LEACH; EP TOXICITY PENDING

* * * * *

RESULTS EXPRESSED IN MILLIGRAMS/KILOGRAM

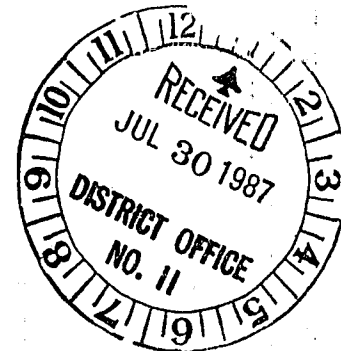
TOTAL HARD.	NA	PH	NA	IRON	NA
(CACO3)		TURBIDITY	NA	MANGANESE	NA
CALCIUM	NA	SPECIFIC COND.	NA	ARSENIC	0.032
MAGNESIUM	NA	T. DISSOLVED SOLIDS	NA	BARIUM	164.04
SODIUM	NA	TOTAL PHOSPHORUS (P)	NA	CADMIUM	13.580
POTASSIUM	NA	SILICA (SIC2)	NA	CHROMIUM	94.50
		BORON	NA	COPPER	20.00
TOTAL ALK.	NA	DISSOLVED OXYGEN	NA	LEAD	292.060
(CACO3)		BOD	NA	MERCURY	ND
CHLORIDE	NA	COD	NA	SELENIUM	ND
SULFATE	NA	AMMONIA (N)	NA	SILVER	4.198
NITRATE (N)	NA	T. SUS. SOLIDS	NA	ZINC	749.50
FLUORIDE	NA			ALUMINUM	NA
				BERYLLIUM	NA
CYANIDES	NA	CARBONATE HARDNESS	NA	NICKEL	NA
OIL/GREASE	NA	NON-CARBONATE HARD.	NA	ANTIMONY	NA
PHENOLS	NA	NAHCO3 ALKALINITY	NA	THALLIUM	NA
TDP	NA	MBAS	NA		
SULFIDE /	NA	FLASH POINT	NA		

CHEMIST: FD NA - NOT ANALYZED ND - NOT DETECTED

* * * * *

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J. RAMSEY---BWM, KDHE-TOPEKA, KS.

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
LABORATORY SERVICES AND RESEARCH
INORGANIC CHEMISTRY LABORATORY
TOPEKA, KANSAS 66620-8420



RESULTS OF LABORATORY ANALYSIS

✓ REPORT TO: DALE T. STUCKEY---SCDO
ADDRESS:

LAB NUMBER: 800091PT
ACCOUNT CODE: WM
MATRIX: SOIL

LOCALITY: CONSERVATION SERVICES 2525 NEW YORK TIME COLLECTED: 1600
COLLECTED BY: DALE STUCKEY DATE COLLECTED: 7- 2-87
SAMPLE ID: CSI#1 DATE-RECEIVED: 7- 8-87
COMMENTS: EP TOXICITY ON 800031PT DATE REPORTED: 7-27-87

* * * * *

RESULTS EXPRESSED IN MILLIGRAMS/LITER

TOTAL HARD. (CACO3)	NA	PH	NA	IRON	NA
CALCIUM	NA	TURBIDITY	NA	MANGANESE	NA
MAGNESIUM	NA	SPECIFIC COND.	NA	ARSENIC	NA
SODIUM	NA	T. DISSOLVED SOLIDS	NA	BARIUM	NA
POTASSIUM	NA	TOTAL PHOSPHORUS (P)	NA	CADMIUM	NA
		SILICA (SI02)	NA	CHROMIUM	NA
		BORON	NA	COPPER	NA
TOTAL ALK. (CACO3)	NA	DISSOLVED OXYGEN	NA	LEAD	0.430
CHLORIDE	NA	BOD	NA	MERCURY	NA
SULFATE	NA	COD	NA	SELENIUM	NA
NITRATE (N)	NA	AMMONIA (N)	NA	SILVER	NA
FLUORIDE	NA	T. SUS. SOLIDS	NA	ZINC	NA
				ALUMINUM	NA
				BERYLLIUM	NA
CYANIDES	NA	CARBONATE HARDNESS	NA	NICKEL	NA
OIL/GREASE	NA	NON-CARBONATE HARD.	NA	ANTIMONY	NA
PHENOLS	NA	NAHCO3 ALKALINITY	NA	THALLIUM	NA
TDP	NA	MBAS	NA		
SULFIDE	NA	FLASH POINT	NA		

CHEMIST: FD NA - NOT ANALYZED ND - NOT DETECTED

* * * * *

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KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
LABORATORY SERVICES AND RESEARCH
INORGANIC CHEMISTRY LABORATORY
TOPEKA, KANSAS 66620-8420



RESULTS OF LABORATORY ANALYSIS

✓ REPORT TO: DALE T. STUCKEY---SCDO
ADDRESS:

LAB NUMBER: 800090PT
ACCOUNT CODE: WM
MATRIX: SOIL

LOCALITY: CONSERVATION SERVICES 2525 NEW YORK TIME COLLECTED: 1600
COLLECTED BY: DALE STUCKEY DATE COLLECTED: 7- 2-87
SAMPLE ID: CSI#2 DATE-RECEIVED: 7- 8-87
COMMENTS: EP TOXICITY ON 800030PT DATE REPORTED: 7-27-87

* * * * *

RESULTS EXPRESSED IN MILLIGRAMS/LITER

TOTAL HARD.	NA	PH	NA	IRON	NA
(CACO3)		TURBIDITY	NA	MANGANESE	NA
CALCIUM	NA	SPECIFIC COND.	NA	ARSENIC	NA
MAGNESIUM	NA	T. DISSOLVED SOLIDS	NA	BARIUM	NA
SODIUM	NA	TOTAL PHOSPHORUS (P)	NA	CADMIUM	NA
POTASSIUM	NA	SILICA (SIO2)	NA	CHROMIUM	NA
		BORON	NA	COPPER	NA
TOTAL ALK.	NA	DISSOLVED OXYGEN	NA	LEAD	0.200
(CACO3)		BOD	NA	MERCURY	NA
CHLORIDE	NA	COD	NA	SELENIUM	NA
SULFATE	NA	AMMONIA (N)	NA	SILVER	NA
NITRATE (N)	NA	T. SUS. SOLIDS	NA	ZINC	NA
FLUCRIDE	NA			ALUMINUM	NA
				BERYLLIUM	NA
CYANIDES	NA	CARBONATE HARDNESS	NA	NICKEL	NA
OIL/GREASE	NA	NON-CARBONATE HARD.	NA	ANTIMONY	NA
PHENOLS	NA	NAHCO3 ALKALINITY	NA	THALLIUM	NA
TDP	NA	MBAS	NA		
SULFIDE	NA	FLASH POINT	NA		

CHEMIST: FD

NA - NOT ANALYZED

ND - NOT DETECTED

* * * * *

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MIKE HAYDEN
Governor
~~XXXXXXXXXXXX~~

~~SECRET~~
Stanley C. Grant, Ph.D.
Secretary

STATE OF KANSAS



Forbes Field
Topeka, KS 66620-0001
(913) 862-9360

DEPARTMENT OF HEALTH AND ENVIRONMENT

RCRA Compliance Inspection Report

T/S/D Facilities Checklist

A. General

Date 7/2/87 Time 0930 EPA ID No. KSD007246846
Facility Name Conservation Services, Inc.
Street 2525 New York
City Wichita, Kansas Zip 67219
County Sedgwick Phone (316) 267-5742
Contacts David Trombold--Hazardous Waste Coordinator
Inspector Dale T. Stuckey
Other 6 employees

B. Activity at Site

<u>Treatment</u>	<u>Storage</u>	<u>Disposal</u>
<u>Chem/Phys/Bio Treatment</u>	<u>X</u> Drums	<u>Incineration</u>
<u>Filtration</u>	<u>Pile</u>	<u>Landfill</u>
<u>Incineration</u>	<u>Surface Impoundment</u>	<u>Land Treatment</u>
<u>Recycling/Recovery</u>	<u>2</u> Tank, Above ground	<u>Surface Impoundment</u>
<u>Reprocessing</u>	<u>Tank, Below ground</u>	<u>Other ()</u>
<u>Solvent Recovery</u>	<u>Other ()</u>	
<u>Thermal Treatment</u>		
<u>Volume Reduction</u>		
<u>Waste Oil</u>		
<u>Other ()</u>		

ADDENDUM TO
TREATMENT, STORAGE, AND DISPOSAL CHECKLIST
LAND BAN F-SOLVENTS

A. For on-site facilities, complete the generator checklist

B. General Facility Standards

1. Was waste analysis plan revised properly to cover Part 268 requirements [264.13 or 265.13]?

Yes

No

2. Did facility obtain representative chemical and physical analysis of waste(s) and residues?

Yes

No

- a. Did testing include analyses for all F001-F005 constituents?

Yes

No

- b. Were analyses performed using TCLP?

Yes

No

If yes, identify lab _____

- c. Describe frequency of sampling:

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

Yes

No (?)

B. Storage (268.50)

1. a. Were F001-F005 wastes exceeding treatment standards stored?

Yes

No

If no, go to "C"

- b. Are all containers and tanks clearly marked to identify contents and date(s) entering storage?

Yes

No NA

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BUREAU OF
AUG 6 1987
WASTE
MANAGEMENT